

EXHIBIT A

THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

CHAO CHEN, individually and)	
on behalf of all those)	No. 3:17-cv-05769-RJB
similarly situated,)	
)	
Plaintiff,)	
)	
v.)	
)	
THE GEO GROUP, INC., a)	
Florida corporation,)	
)	
Defendant.)	

VIDEO-RECORDED DEPOSITION UPON ORAL EXAMINATION OF
NWAUZOR UGOCHUKWU
June 19, 2018
Fircrest, Washington

Taken Before:

Laura A. Gjuka, CCR #2057
Certified Shorthand Reporter

A P P E A R A N C E S

For the Plaintiffs:

ADAM J. BERGER
Schroeter Goldmark Bender
500 Central Building
810 Third Avenue
Seattle, WA 98104
206-622-8000
berger@sgb-law.com

MEENA P. MENTER
Menter Immigration Law, PLLC
8201 164th Avenue NE
Suite 200
Redmond, WA 98052-7615
206-419-7332
meena@meenamenter.com

For the Defendant:

CHARLES A. DEACON
Norton Rose Fulbright
300 Convent Street
Suite 2100
San Antonio, TX 78205-3792
210-270-7133
charlie.deacon@nortonrosefulbright.com

JOAN K. MELL
III Branches Law, PLLC
1019 Regents Boulevard
Suite 204
Fircrest, WA 98466
253-566-2510
Joan@3brancheslaw.com

Also Present:

MICHAEL HEHENKAMP
Sound Vision Video Production
4821 North 14th Street
Tacoma, Washington, 98406

EXAMINATION INDEXEXAMINATION BY:PAGE NO.

Mr. Deacon

5

EXHIBIT INDEX

(No exhibits marked for identification.)

1 BE IT REMEMBERED that on the 19th of June,
2 2018, 9:11 a.m., at 1019 Regents Boulevard, Fircrest,
3 Washington, before LAURA A. GJUKA, CCR# 2057, Washington
4 State Certified Court Reporter residing at University
5 Place, authorized to administer oaths and affirmations
6 pursuant to RCW 5.28.010.

7 WHEREUPON the following proceedings were had,
8 to wit:

9 * * * * *

10 VIDEOGRAPHER: Good morning. We are on
11 the record. This is a videotaped deposition. Today's
12 date is June 19th, 2018, and the time is 9:11 a.m. My
13 name is Michael Hehenkamp, working with Sound Vision
14 Video Productions in Tacoma, Washington. This
15 deposition is being held at 1019 Regents Boulevard,
16 Suite 204, in Fircrest, Washington 98466. The case is
17 Chen versus The GEO Group.

18 Present for the plaintiff is Adam Berger. Present
19 for the defense and noticing the deposition is
20 Joan Mell. Also present is Charles Deacon. The witness
21 is Ugochukwu Nwauzor. The court reporter today is
22 Laura Gjuka who will now swear in the witness and
23 proceed with the deposition.

24 MR. DEACON: We have another appearance
25 here.

1 VIDEOGRAPHER: And also present is
2 Meena Menter.

3 MS. MELL: You do need to answer orally.

4 MR. DEACON: Do you agree to --

5 THE WITNESS: What?

6 MR. DEACON: You are sworn under oath to
7 tell the truth.

8 THE WITNESS: Yeah, I will swear on the
9 truth.

10 MR. BERGER: Yeah. You have to answer
11 orally and say, "I do."

12 THE WITNESS: I do.

13
14 UGOCHUKWU NWAUZOR, having been first duly sworn
15 by the Court Reporter, was
16 examined and testified as
17 follows:

18
19 EXAMINATION

20 BY MR. DEACON:

21 Q Mr. Goodluck, my name is Charlie Deacon, and I'm taking
22 your deposition here today because you have sued my
23 client, The GEO Group. Do you understand that?

24 A (Witness nods head.) Yeah.

25 Q You have to say yes or no.

1 Q Some medication?

2 A Some medication. And that was -- I was -- I forgot that
3 pod, before I was transferred to G-2.

4 Q Okay. So that --

5 A That was my first pod when I got there in detention.
6 And then there we have a kind of general restroom.
7 There in G-2 -- there in G-2, in my room, we have the
8 toilet, we have everything there. You can pee there.
9 But in the former pod it's general. It's not in the
10 room. Everybody is -- you know, the bed is outside the
11 hall. Then we are in G-2, I have -- everybody have room
12 inside. The only thing we come around to do is take a
13 shower outside. But you can have your everything in
14 your room.

15 There something happened when I was taking the pill.
16 The doctor tell me I will be frequently going to, you
17 know, pee a lot of water. When I taking that drug, you
18 know, I see kind of change in my body. Like going to
19 pee, the doctor also told me you will experience much
20 urination, you know.

21 Some -- when I went to the general -- you know, the
22 general toilet, somebody was already there. I don't
23 know what I can do, like -- you know, I have to say, I
24 hold my this thing. I don't know what to do. I was
25 like, what is going on? Please, Bro. And the guy over

1 there is not an English-speaking guy. He doesn't
2 understand me. And myself, I don't understand him. He
3 starting shouting.

4 I'm like my bladder like coming out my -- you know,
5 I left that restroom, walked down to another restroom.
6 I met one Africa guy, that guy is from Africa, he going,
7 Please, please, please, please. Then just. The first
8 guy went to the -- went to the --

9 MS. MELL: Security.

10 THE WITNESS: -- security in charge of the
11 pod. The security called me. I explained everything to
12 the security, brought all my pills to the security.
13 Look at what I'm going through. I don't have a private
14 room. If I have private room I can pee there whenever I
15 want to pee. But the condition I find myself. I can't
16 pee outside there. When I got go to the room, I saw
17 this guy, and this guy couldn't help me. I don't know
18 what he -- you know, what he thought I'm going to do to
19 him.

20 I'm like -- I was crying. Most of the people there
21 understand, you know, the condition I find myself. The
22 guard said, You're going to remove me from this pod,
23 reported me to the highest security. They called me. I
24 explained everything to them. Look at what's happened.
25 They told me they going to check the camera. They going

C E R T I F I C A T E

I, Laura Gjuka, a Certified Court Reporter in
and for the State of Washington, residing at
University Place, Washington, authorized to administer
oaths and affirmations pursuant to RCW 5.28.010, do
hereby certify;

That the foregoing Verbatim Report of Proceedings
was taken stenographically before me and transcribed
under my direction; that the transcript is a full, true
and complete transcript of the proceedings, including
all questions, objections, motions and exceptions;

That I am not a relative, employee, attorney or
counsel of any party to this action or relative or
employee of any such attorney or counsel, and that I am
not financially interested in the said action or the
outcome thereof;

That upon completion of signature, if required, the
original transcript will be securely sealed and the same
served upon the appropriate party.

IN WITNESS HEREOF, I have hereunto set my hand this
25th day of June, 2018.

Laura Gjuka, CCR No. 2057